



Appeal Ref: APP/P3800/W/18/3218965
Site Address: Former Wealden Brickworks Site, Langhurstwood Road, Horsham, West Sussex, RH12 4QD
Description: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure
Application Ref: WSCC/015/18/NH
Appellant: Britaniacrest Recycling Ltd
Start date: 14 January 2019

Warnham Parish Council opposes the appeal proposals. The reasons for this overlap with those of the LPA.

Objection to the Appeal

Warnham Parish Council's original objection was submitted in April 2018. In the light of the appeal against refusal and the legal advice provided to the WSCC Planning Committee the Parish Council has reviewed the original submission and amended the scope of the Council's submission.

The bases for the objection are:

- 1. Non-compliance with policies of WSCC's Waste Local Plan**
- 2. Scale, location and visibility of the development**
- 3. Aviation lights and site illumination**
- 4. Lack of robust flue stack design**
- 5. Power generation assessment**
- 6. Pollution concern.**

Items 4 and 5 are additional to the original objection.

1. Non-compliance with policies of WSCC's Waste Local Plan

Due to the scale and location of the facility it will have an over-powering impact on the parish and the locality, and will be visible from an extensive area of West Sussex and Surrey. As such, it is at variance with the WSCC Waste Local Plan.

Policy W11: Character. *Proposals for waste development will be permitted provided that they would not have an unacceptable impact on: (a) the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas; and on (b) the distinctive character of character of towns and villages.*

The proposal will have a dramatic adverse effect on the character and ambience of the area and hence it is unable to meet this policy.

Policy W12: High Quality Developments. *Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) take into account the need to: (a) integrate with and, where possible, enhance adjoining land-uses and activities; (b) have regard to the local context including: (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area; (iv) views into and out of the site.*

The proposals are clearly of a nature and scale that render it unable to meet this policy.

2. Scale, location and visibility of the development

A prominent feature adjacent to the application site is the chimney to the Wienerberger brickworks. This chimney is reported to be 26.5m high. The proposed building, at 35.92m height and approximately 140m long, is vast and will be 1.36 times as high as the existing chimney. The proposed flue stack, at 95m, is over 3.5 times the height. The sketch shown in Appendix A with the brickworks chimney superimposed shows the scale of the proposal in comparison to the existing

The existing chimney is readily visible from roads in the area. A development of this scale will present an unacceptable visual and physically overpowering intrusion into the rural countryside, the locality and the environment of residential developments, particularly those in Station Road, Warnham.

The illustrations submitted by the applicant demonstrate the dominance, visual impact and hence intimidating nature of the building and accompanying stack. The building itself will be visible from housing in Station Road, from much of Warnham village and many surrounding rural houses. The flue stack and/or its plume will be visible from locations in the parish and as far away as Box Hill, Surrey. It is unacceptable that any industrial development in the countryside should have a visual exposure over such an extensive rural area.

The majority of Warnham village is a Conservation Area and the parish has over 90 Listed Buildings. Visual impacts of this dominance will degrade the value of the heritage assets of the parish and its conservation status. The intrusion of the stack will be particularly intimidating at times when the exhaust plume is being emitted.

The visual impacts are assessed in the application documentation from many locations in the village and parish. Despite the acknowledgement that the building roofline and flue stack will be visible from most locations it is not reasonable that the impact of this vast development from all locations is mainly assessed as 'Minor Adverse' impact. The visual impact on the cluster of residential properties at Andrews Farm, Station Road is assessed as 'Moderate to Major'. It is not reasonable

that this alien development should have an adverse impact of any significance on any residents and views of the parish.

3. Aviation lights and site illumination

The flue stack and building will have aviation lighting. The roads and vehicle manoeuvring areas surrounding the plant will have lighting. Multiple sources of continuous lighting and an ambient lighting glow from the site will be an unwelcome intrusion to the countryside night skies.

4. Flue stack

The lack of evidence of the flue stack design is of concern. At 95m high and 2.5m diameter it is extremely slender but at an exhibition of the proposals a representative of the applicant stated that the flue stack had not yet been fully designed. Reference was made to a comparable plant in Cornwall as an example of how the actual stack may look. This has two adjacent, linked flues of 120m. It is possible that the final design of the stack will require a structure of greater diameter than that indicated, or multiple stacks. The structural design is not proven and needs to be demonstrated - potential wind induced vibrations and harmonic oscillations will be a design issue. It is not uncommon to fit stacks with fins or aerofoils to dissipate wind forces. The addition of external features could greatly increase the width of the stack and thereby extend the potential for visual intrusion, and will render the evidence submitted to date as superseded. Prior to the resolution of the Inquiry the design of the stack should be finalised and its full impact established.

5. Power generation

The potential power generation of the plant is 21MW with 18MW available to export to the grid which is claimed to be sufficient to power 43,000 homes. This number of homes represents 77% of the homes in Horsham. The power generation of the plant is promoted as a significant benefit of the proposals yet there is no supporting evidence to justify the output data and claimed benefit. Prior to resolution of the Inquiry the applicant should provide evidence of the output of the plant, the number of homes that can be supplied and the arrangements made with the electricity grid to purchase and transmit the generated power.

6. Pollution concern

Residents in the parish are widely concerned at the potential effect on their health from particulate and other emissions from the flue. Although the plant is required to meet emission standards required by the Environment Agency there remains concern regarding the long-term cumulative impact; this is unproven. Equally, there is concern that process equipment for installations similar to that proposed are often subject to unplanned situations which could result in significant short-term pollution of dangerous intensity. The planning application contained no manufacturer information on the specific thermal treatment installation proposed. The application has not demonstrated that the proposed installation is able to meet the emissions limits and real data from similar installations already operating elsewhere in the country should be provided as evidence, along with any breaches of Environmental Permit conditions, so that an informed decision can be made regarding the likely impacts on local air quality and human health. Considering the rural setting of the proposed installation, further detail on the potential for deposition of heavy metals, dioxins and

PAH's on to crops and impacts on animal rearing should also be provided by the applicant prior to any decision being made.

Conclusion

The development is of a scale and impact totally out of proportion to the proposed countryside location, the local environment and its proximity to residential areas of Warnham parish and the village Conservation Area. It will be a blight on the parish and engender anxiety at having such an unwelcome, un-neighbourly process plant on our doorstep.

Warnham Parish Council emphatically request that the appeal is dismissed.

On behalf of Warnham Parish Council,



Mrs A J Brooks,

Parish Clerk

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April 2018 – Revised March 2019

APPENDIX A

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Sketch referred to at paragraph 2

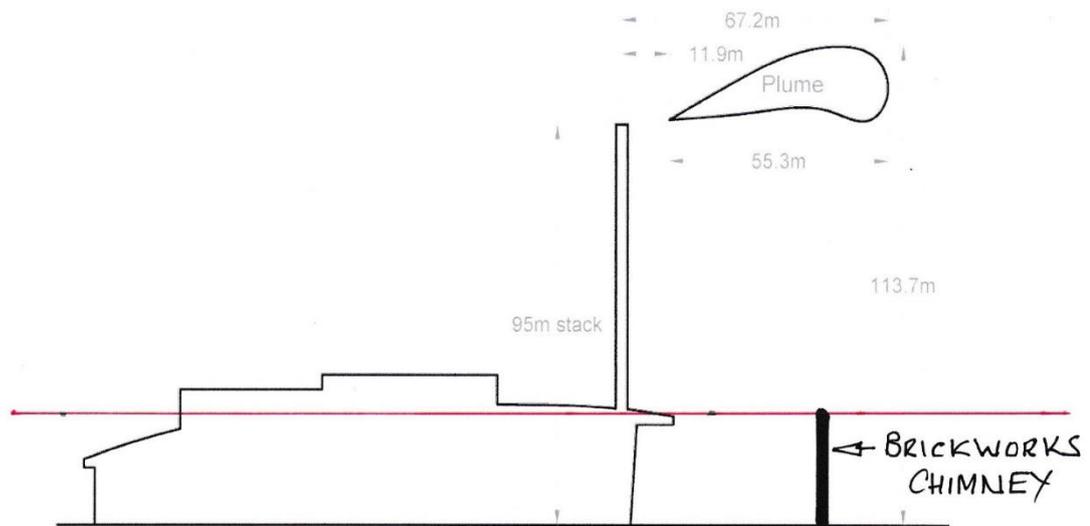


Figure 5.1.2 Modelled Plume